

EXHIBIT 9

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ANTHONY EID,

Plaintiff,

Case No. 2:20-cv-GAD-DRG

-vs-

WAYNE STATE UNIVERSITY, WAYNE STATE
UNIVERSITY SCHOOL OF MEDICINE, NIKOLINA
CAMAJ, MARGIT CHADWELL, MATTHEW JACKSON,
RICHARD S. BAKER, R. DARIN ELLIS, in
their individual and official capacities,
jointly and severally,

Defendants.

ZOOM DEPOSITION OF MARGIT CHADWELL, M.D., F.A.A.F.P.

Taken remotely via video conference by the Plaintiff on
Thursday, the 7th day of October, 2021 in Birmingham,
Michigan at 10:00 a.m.

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Job No. 16301

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25 Job No. 16301

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ATTORNEY'S NAME	DIRECT	CROSS	REDIRECT	RECROSS
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(E-mail from P. Burton to M. Chadwell)

Deposition Exhibit B 4 42

(Chadwell/Robichaud E-mail)

Deposition Exhibit C 4 53

(Investigation Report)

Deposition Exhibit D 4 37

(E-mail)

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Deposition Exhibit G 4 67

(E-mail with M. Jackson)

* * *

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Thursday, October 7, 2021

Birmingham, Michigan

10:01 a.m.

* * *

(Deposition Exhibits A-E and G
marked for identification.)

MARGIT CHADWELL, M.D., F.A.A.F.P.

Having been first duly sworn, testified as follows:

MR. FLORES: Thank you.

DIRECT EXAMINATION

BY MR. FLORES:

Q Dr. Chadwell, if we can, if you would just give me your full name, and spell your last name just to make sure we get that right for the court reporter.

A Sure. It's Margit Cornelia Chadwell, C-h-a-d-w-e-l-l.

Q Dr. Chadwell, I'm sure that David has told you, I'm Bob Flores, I represent Mr. Eid, and we're going to have a conversation this morning, which is really all a deposition is. I try to get as much information as possible so that we can narrow the issues, and hopefully simplify the case for the Court.

I'm going to ask you questions, and you'll answer them to the best of your ability. And I'm just curious, have you ever been a witness in a trial prior to today's testimony at a deposition?

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1 A No.

2 Q And have you ever given testimony of any kind under oath?

3 A I've given a brief deposition once on a clinical case.

4 MR. FLORES: Her microphone -- you're coming across
5 pretty garbled. Can everyone else hear her?

6 MR. PORTER: I can, because I'm sitting right next
7 to her.

8 THE WITNESS: I just turned up my microphone. Is
9 it better?

10 COURT REPORTER: I can hear, but it is a little
11 garbled; I agree.

12 MR. FLORES: I think that -- whatever she did, that
13 fixed it.

14 THE WITNESS: Okay.

15 Q (BY MR. FLORES) And have you ever been party to a lawsuit?

16 A No.

17 Q In a deposition, you know, with few exceptions, there's a
18 requirement to answer all questions that I pose to you.
19 You've got your attorney, Mr. Porter, sitting next to you,
20 and if he believes that there's an objection to be made as to
21 a question, he'll make a short objection on the record. That
22 will preserve it, and then after he's done with that, please
23 go ahead and answer the question.

24 Yesterday there were some moments when the objection he
25 was raising was one involving a privilege, so an

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1 attorney/client privilege, or there are other types of
2 privileges. In the event that he raises that type of a
3 privilege, you're not going to need to answer the question,
4 but we do want to get his objection, and then he and I will
5 deal with those objections at a later date.

6 A Okay.

7 Q The reason, as I said, for this deposition, is really to try
8 and narrow some of the issues for trial, and save the Court's
9 time. And so sometimes I get in the midst of a series of
10 questions, lose track of time, and I can go for a long period
11 of time without taking a break. If you need a break, please
12 let me know. I'm going to try to break once an hour, at
13 least for 10 minutes, whether we need it or not. There might
14 be some phone calls or things that need to be returned that
15 can't wait until the end of the day.

16 A Okay. Sounds good.

17 Q Now, you're sitting right next to David, I assume, or close
18 by?

19 A Me? Yes. Right.

20 Q During the course of the deposition, I will be showing you
21 some documents, and asking you to either read them, read them
22 out loud, or just use them to help refresh your
23 recollection. And I'll try to do that by showing you the
24 document and having you read it, and that way we won't have
25 to go back and forth, back and forth; I can ask you a series

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1 of questions after you've had a chance to read it. Hopefully
2 that will save a little bit of time.

3 As a result of my providing those documents, that also
4 reminds me to tell you, you may not have any documents with
5 you, unless David identifies what they are, or they're a copy
6 of what I'm showing you.

7 We have a tech, an exhibit tech with us, Bailey Wellman,
8 and she's the one that is going to make sure you can see
9 these documents. At my age, I'm not as tech savvy as the
10 younger people, and so I did not want to take that
11 responsibility on; that causes us to lose a lot of time.

12 One of the answers that you may provide me after I ask
13 you a question is that you simply don't remember or you don't
14 know, but you are aware that there may be a document, or some
15 other material that would refresh your recollection.

16 A (Witness nodding head.)

17 Q In that case, feel free to identify that document. If I have
18 it, I'll display it; if not, we'll figure out how to deal
19 with that, and that's sometimes what we take care of during
20 the breaks.

21 A Okay.

22 Q Now, what I'm -- I'm not assuming you're going to do this,
23 but it's just part of my typical introduction. There are
24 some witnesses who come to a deposition and mysteriously have
25 forgotten everything that they've ever known about the case,

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1 and so I end up having to spend a lot of time showing them a
2 document, asking them to read it, refreshing their
3 recollection, and going back and forth.

4 That's really kind of counterproductive. I don't expect
5 that you're going to do that, because your time is extremely
6 valuable, but nonetheless, if we end up going down that kind
7 of a route, it's going to take a lot of time.

8 So let's get started now with some questions about your
9 prep for the deposition. And, again, I want to say, if I
10 ever ask you a question about a conversation, or did you meet
11 with your lawyer, or did you spend time with them, I'm not
12 asking for you to tell me what you told them, or what they
13 told you. I'm simply asking you for facts just to create a
14 record, to make sure that certain things were done, and are
15 not going to come back later on in the course of the case.

16 So, Dr. Chadwell, did you meet with your attorney, or a
17 member of your lawyer's firm to prepare for the deposition?

18 A Yes.

19 Q How much time did you spend in preparation with them, if you
20 can recall?

21 A About two and a half hours.

22 Q And when did that take place?

23 A On Tuesday afternoon of this week.

24 Q And you're a little bit garbled. Can you --

25 A Okay. I'll move up to the microphone more. About two and a

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1 half hours on Tuesday afternoon of this week.
2 Q Okay.
3 A Can you hear me?
4 Q That's much better; it just may be me.
5 A Okay.
6 Q So that was in person, not on video or Zoom?
7 A It was on Zoom.
8 Q Did you prepare any documents in preparation for this
9 deposition?
10 A I did not, except for what I provided quite some time ago in
11 terms of the communications.
12 Q All right. So you did not take any notes, or make any
13 writings as part of your preparation for today?
14 A No, I don't have anything.
15 Q We submitted some document requests quite some time ago to
16 your attorneys, and I'm sure that they asked you about them.
17 Did you personally participate in searching for, or providing
18 documents as part of that document request, if you know?
19 A Yes, I did a query of my E-mail communications in the time
20 frame that I was provided, and then I also asked, you know,
21 IT to do a bigger search to catch everything, and I think
22 Kristen Cook saw to it that that happened.
23 Q Other than your lawyers, or members of their offices, did you
24 receive any help from anyone else in preparing for the
25 deposition?

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1 A No, not for this.

2 Q Do you keep a personal calendar?

3 A I have an Outlook Calendar, yes.

4 Q And do you use that for personal and professional scheduling,
5 or just one or the other?

6 A I do both. Yeah, it's primarily for professional, but I do
7 add some personal things, just to keep myself organized.

8 Q And do you have a secretary?

9 A I have -- no, I don't have a personal secretary; I have a
10 team, a staff, and I have a supervisor that helps to support
11 me, but I don't have a designated personal secretary.

12 Q And do they work with you in your office, or have they been
13 remote for the last year?

14 A I'm sorry. You know, it says my bandwidth is low, and so
15 it's getting a little -- you look frozen on the screen, off
16 and on.

17 Q Okay.

18 MR. PORTER: Bob, can I suggest that -- let me
19 suggest, we're using a different laptop than we did
20 yesterday. Give us just a few minutes. Let me go get the
21 other laptop, I'll get her hooked up on that, and I think
22 that will solve our problems.

23 MR. FLORES: All right. We'll take a break.

24 (Whereupon, a short break was taken.)

25 MR. FLORES: One other thing I wanted to add, I've

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1 got you all on one monitor, I've got my questions on another,
2 and some documents in front of me. So if I pause, it's
3 usually because I'm trying to see if I can skip some
4 questions because you've given me the answer that I needed,
5 so I can move forward.

6 THE WITNESS: Do you mind just turning your volume
7 up just a little bit.

8 MR. FLORES: Is that better?

9 THE WITNESS: It's okay.

10 (Off the record discussion.)

11 Q (BY MR. FLORES) All right. Does the University provide you,
12 Dr. Chadwell, with a telephone or cell phone?

13 A No.

14 Q So you use only your personal telephone, is that right?

15 A Correct.

16 Q And the cell phone number for your personal phone, could you
17 provide that, please?

18 A It's (313) 452-3646.

19 Q And you have a desk line at your desk?

20 A I do.

21 Q Is that a direct dial?

22 A Yeah. Yes. I don't even know what that number is, because
23 it goes, typically, through the reception desk to my line.

24 Q When you give out a number for your desk line, or for your
25 office, what number do you give out?

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1 A It's (313) 577-1463.

2 Q And do you keep a -- is your Outlook Calendar paired with
3 your cell phone?

4 A Yes.

5 Q And with respect to this case, do you remember ever making
6 telephone calls, or receiving telephone calls related to this
7 case on anything other than your desk line or your office
8 line, and your personal cell phone?

9 A No.

10 MR. PORTER: Objection, foundation.

11 Q (BY MR. FLORES) And your answer was no?

12 MR. PORTER: So, you still can answer after I
13 object, unless I instruct you not to.

14 THE WITNESS: I don't remember getting any other
15 phone calls on any other devices.

16 Q (BY MR. FLORES) Okay. Let's talk -- let me just get on the
17 record your educational background. Dr. Chadwell, where did
18 you earn your medical degree?

19 A At Wayne State University, School of Medicine.

20 Q And what years were you there?

21 A From 1990 to 1994.

22 Q And after your -- after you concluded your, you got your
23 degree, where did you do your residency?

24 A I did my family medicine residency training at Oakwood
25 Hospital in Dearborn, Michigan from 1994 to 1997.

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1 Q And after Oakwood, what was your next job?

2 A I came on to the faculty of that residency program.

3 Q Was that a residency program that was run by Wayne State, as
4 well, or a different medical school?

5 A We were affiliated with Wayne State, but it was run by
6 Oakwood Hospital, itself.

7 Q And when did you start working at Wayne State in an academic
8 posting?

9 A In June of 2010.

10 Q And what was that position?

11 A I came on as the Clerkship Director for the Family Medicine
12 Clerkship in that department, in Family Medicine and Public
13 Health Sciences.

14 Q And that was a -- can you describe what that entailed?

15 A Sure. So I was responsible for the core clerkship in Family
16 Medicine, which is one of seven core clerkships, it was at
17 the time, that all students complete in their third year of
18 clinical training, and so I was responsible for coordinating
19 that for all the students going through that program.

20 I also had responsibility for a student run free clinic
21 that was just starting out, and I was the Medical Director
22 for that, and did some other teaching for the Medical School
23 as an Assistant Professor.

24 Q And when did -- how long did you hold that position?

25 A Until March of 2017.

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1 Q And what position did you take at that time?

2 A I took the position as Associate Dean of Student Affairs and
3 Career Development.

4 Q That's the position that you're currently in?

5 A Correct.

6 Q Do you hold any other medical or academic appointments?

7 A I'm Associate Professor still within my department, home
8 department of Family Medicine and Public Health Sciences.

9 Q Do you teach classes, as well?

10 A No, not at this time.

11 Q And could you give me an idea as to, generally speaking, what
12 are the responsibilities in your current position?

13 A So my core responsibilities are for 1,200 medical students
14 across all four years so, basically, from matriculation to
15 graduation. I oversee any student issues that come to my
16 attention; I uphold the ideals of what it means to become a
17 medical professional physician in training, and I help guide
18 them through the medical school process, successfully into
19 their specialty residency training.

20 Q You mentioned ideals that the school holds for the students;
21 can you tell me what those are?

22 A So everything related to professional standards, technical
23 standards, just to make sure that students are developing
24 professionally in terms of, you know, all around
25 academically, personally in terms of, you know, upholding

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1 integrity; how to act as a physician, essentially. What is
2 expected of them as a physician as they transition through
3 the various stages into residency.

4 Q And with so much cultural change going on, does that look
5 different today in terms of what the ideals are than it did,
6 say, when you became a medical doctor?

7 A They are different in the sense, for sure, in terms of having
8 a lot more awareness in terms of social determinants of
9 health, social justice issues, those types of things that we
10 have now incorporated into our curriculum, and make sure that
11 students are aware of that. Implicit bias training, things
12 like that, which were not part of the medical school training
13 that I went through at Wayne. But, yes, it has changed a
14 lot, but I would say the basic essence of professional
15 development are still the same in medicine; medicine is still
16 pretty traditional still.

17 Q In your work as the Associate Dean, and with all those
18 students, is Title 10 something that you touch on in terms of
19 your responsibility, although, I realize you're not the Title
20 9 Coordinator, but what's your involvement with Title 9?

21 A Sure. So, yes, Title 9 is something that touches my office
22 when a student has a concern, and that comes to me, or
23 bubbles up through either directly from a student or through
24 one of the counselors that works in our office. And then I,
25 you know, help to work through that with the Title 9 Officer

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1 on Main Campus if it comes to that level.

2 Q So do you have regular meetings with the Title 9 Coordinator,
3 or is it just as necessary?

4 A As needed, but we have an ongoing, yeah, relationship, so --

5 Q And since you took the position as Associate Dean, has the
6 Title 9 Coordinator remained the same during your tenure?

7 A I think Brandy Banks, I can't remember how long she's been in
8 her position. I believe there was a changeover, but the
9 person I've been mostly dealing with is Brandy Banks in the
10 last few years that I've been in the position.

11 Q Do you recall whether she was there in 2018?

12 A I don't know the exact time that she started.

13 Q Okay. The Office for Civil Rights at the Department of
14 Education that administers Title 9 requires that certain
15 faculty, certain officials receive training on Title 9, and
16 the changes that happen. They primarily focus on the Title 9
17 Coordinator, but have you received any training with respect
18 to Title 9 while you've been Associate Dean?

19 A Yes.

20 Q And was that provided internally, or did you go to a
21 conference, or attend some seminar for that?

22 A Internally, yeah. And then peripherally through conferences,
23 issues, you know, it would be part of some presentation,
24 sometimes at conferences, but like the AAMC, for example, but
25 primarily internally.

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1 Q Can you give me again, you said it pretty quickly, the name
2 of that association?

3 A The AAMC, the American Academy of Medical Colleges.

4 Q Thank you. Sometimes I'll do that just to help out the court
5 reporter, because she may not catch that.

6 A Sure. Sure.

7 Q And do you remember when the last time was that you received
8 any training on that?

9 A I believe it was last summer, and that was an internal
10 presentation.

11 Q So that would have been summer of '21?

12 A No, 2020. I guess we're in the fall now so, yeah, last
13 summer I'm referring, yeah, 2020.

14 Q And do you remember whether or not you were provided
15 materials as part of that training?

16 A It was a PowerPoint presentation on -- yeah, I don't
17 remember, like, reviewing a packet or something like that; it
18 wasn't like that.

19 Q I went on your -- I went on the School of Medicine's website,
20 and I took a look at how the website describes your mission,
21 and I'm going to just read you what that quote is.

22 It says, Providing students with a welcoming
23 environment, timely and accurate advising, programs designed
24 to enhance student well-being, and major school events to
25 celebrate the milestones of your medical school careers.

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1 Students are encouraged to meet with our staff or the
2 Assistant Dean at any time, knowing that confidentiality is
3 respected and upheld. Our office provides a variety of
4 services, all central to your well-being and development.

5 Is that close or consistent with what you know to be the
6 mission of your office?

7 A Yes.

8 Q At the schools that I have attended, the person at the top
9 usually is, whether you're talking about a Principal, or a
10 Superintendent, or a Dean, those are people who don't get
11 nearly as many problems presented to them as the assistants
12 underneath. So whether it's the Vice Principal, or an
13 Associate Dean, or an Assistant Dean, or it seems like the
14 assistants deal with a lot of the pain and anguish, and the
15 Deans, and the Principals, and the Superintendents are there
16 to make sure they're smiling, they're representing the
17 school, and everybody likes them.

18 So I just wanted to get a sense, because sometimes
19 websites, even though that's the stated mission, the reality
20 is a little bit different. And so I wanted to ask you, when
21 you think about yourself relative to the Dean of the Medical
22 School, are you kind of the good cop or the bad cop, or is
23 there any kinds of situation like that?

24 MR. PORTER: Objection, form and foundation.

25 Q (BY MR. FLORES) If you can answer that question, I'd

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1 appreciate it.

2 MR. PORTER: Go ahead.

3 THE WITNESS: Can you repeat the question.

4 Q (BY MR. FLORES) Are you -- do you view yourself, in terms of
5 the mission of your office, in your particular role, would
6 you see yourself as someone that the students would see as,
7 I'm going to go to talk to Dean Chadwell, because she can
8 help me or, I don't really want to talk to Dean Chadwell
9 because she's like the disciplinarian within the Medical
10 School?

11 A It's definitely number one.

12 Q All right. Good.

13 A That's my life.

14 Q Do you address both behavioral and academic issues for
15 students, or does someone else, do you share that
16 responsibility with someone else?

17 A It's a shared responsibility with other offices. Student
18 Affairs is not primarily academic, although, obviously, yes,
19 we provide a lot of support for students with academic
20 challenges, as well as behavioral aspects, too.

21 Q So it's fair to say that students are encouraged to look at
22 you and your office in a positive way, where they should go
23 to get help if they're having a problem?

24 A That's true.

25 Q Do you know my client, Anthony Eid?

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1 A Excuse me?

2 Q Do you know my client, Anthony Eid?

3 A I know him as a student, former student, yes.

4 Q And when he was a former student, did he hold any student
5 government position?

6 A He did. He was the President of his class.

7 Q I want to direct your attention now -- I want to focus a
8 little bit more on the actual case, so I want to direct your
9 attention first to October 31, 2018. And on that date did
10 you have a discussion with a woman by the name of, with the
11 first name of Pamela?

12 A I did.

13 Q At the time that you had that conversation, had you ever met
14 her previously?

15 A I had not.

16 Q And did you learn her last name?

17 A Yes, I did.

18 Q And the last name?

19 A Excuse me.

20 Q Last name?

21 A Burton.

22 Q And how did it -- how did you come to talk with her on that
23 date?

24 A My receptionist provided me with a, basically put forward a
25 message, that this Pamela Burton wanted to speak with me. I

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1 had no idea what it was about. I called -- I returned the
2 call from my desk phone that afternoon.

3 Q And approximately how long did that telephone call last?

4 A It was maybe 10, 15, about a 15-minute conversation, I would
5 say.

6 Q And could you, to the best of your recollection, please
7 describe that telephone conversation in detail?

8 A So she called me with a lot of seriousness in her demeanor,
9 her voice over the phone, and basically let me know that she
10 was encouraged to give me a call. She was encouraged by Dr.
11 Friday, who was a colleague, and a strong faculty member in
12 the School of Medicine for many, many years, and worked at
13 Children's Hospital; she was the Pediatric Clerkship
14 Director, and this Pam Burton was a nurse, she told me, at
15 Children's Hospital.

16 So she had worked with Dr. Friday, and had recounted the
17 same thing she was about to tell me to Dr. Friday, and Dr.
18 Friday said, you know, you ought to give the School of
19 Medicine a call, and let them know this and see, you know,
20 you know, where this might go. And so that's -- so on that
21 encouragement, she called me that day and recounted her
22 story.

23 Q So just to be clear, the doctor who you've just mentioned,
24 that's Dr. Friday, as in the day of the week?

25 A Yes, Dr. Friday. Uh-huh.

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1 Q Children's Hospital?

2 A Yes.

3 Q That's in Detroit?

4 A Right.

5 Q And now, when she -- well, what did she tell you about the
6 case she was calling you about; what did she say?

7 A She told me about her daughter, who was a Wayne State
8 undergraduate student, and her connection with one of our
9 medical students, Mr. Eid, and that there had been ongoing
10 issues in terms of communications that were troublesome. And
11 that there had also been a posting of what seemed to be a
12 fake Court case and, essentially, there were just these --
13 and that turned out to be something that wasn't real.

14 And because of all the troublesome communication between
15 her daughter and Anthony Eid, and she also recounted her
16 daughter felt unnerved by this, that she had already
17 proceeded to go to the Wayne State Police on this, and she
18 just wanted it to stop.

19 And she just, you know, didn't really know where else,
20 what else to do with this, but she felt very strongly that,
21 you know, once she found out Mr. Eid was a medical student,
22 that that is not in holding with, you know, how a medical
23 student or future physician should conduct themselves.

24 So that's what she basically recounted to me in terms
25 of, yeah, there was definitely high seriousness and concern

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1 on her part and there was, yeah, the semblance of behavior
2 that seemed to be very out of touch with what we would expect
3 from a medical student.

4 Q And let me just go back just a couple questions. So at one
5 point during the conversation did she talk about the Wayne
6 State Police Department?

7 A She mentioned Wayne State Police, and I believe they had
8 already -- they were in the process of filing a report with
9 them at the time. I mean, they had -- it sounded like they
10 had endured a couple of years, almost, of these inappropriate
11 interactions, and it just had come to a point where they felt
12 like they needed help from the University.

13 Q When you say they, you're talking about the Burtons --

14 A I am.

15 Q -- making a complaint?

16 A Right.

17 Q And your recollection is that these allegations about
18 troubling behavior lasted a couple of years; that's your
19 recollection?

20 A It seemed like they, they had been quite protracted. Yeah,
21 it seems like they had been -- because her daughter was an
22 undergraduate student, so Anthony was a year two student at
23 the time, so that would have had to been a few years ongoing
24 from what she was telling me.

25 Q At the time that you spoke with Pamela Burton, was her

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1 daughter a current student at Wayne State?

2 A I believe she had actually transferred, or decided to move
3 out West, I believe it was Colorado, and I think that was
4 just in process, or -- but, yeah. She was referring to what
5 had happened when they were both students at Wayne.

6 Q So do you remember whether or not, at the time you took the
7 phone call in 2018, whether she was or was not a student at
8 that time?

9 A I don't know the exact dates of when her daughter, you know,
10 left Wayne State, or if she had left at that very point. All
11 I know is that what she was recounting happened while she was
12 a student at Wayne, as was Anthony.

13 Q Is there anything else that you remember from that phone
14 call?

15 A I remember that she just had this real urgency about it, and
16 a real seriousness, as I said before, and maybe even a
17 little, like, some, like, angst and fear. I mean, that's why
18 the police issue, you know, that came up as them proceeding
19 with that. And I think the Court case, the fictitious Court
20 case, that was really troublesome to them, and really
21 worrisome.

22 And so, yeah, they -- that's what I remember distinctly
23 from that conversation, that this had been just really
24 bothersome to the entire family, and really scary to the
25 whole family. She was worried for her daughter, clearly.

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1 MR. FLORES: Bailey, if you would publish **Exhibit A**
2 so that Dr. Chadwell and the others can take a look at that
3 document, please.

4 EXHIBIT TECH: One moment. And I'm going to drop
5 it in the chat. We were having a little problem with Drop
6 Box this morning, so I'm going to drop the pdf in there, so
7 it will actually have to be downloaded to be viewed.

8 THE WITNESS: So I should click on the chat?

9 EXHIBIT TECH: Or you can look at the shared screen
10 here, and Mr. Flores will direct me as to what we want to
11 look at.

12 MR. FLORES: Go down to the first full page.

13 Q (BY MR. FLORES) Do you recognize what that is, Dr. Chadwell?

14 A Yeah, this is the, it looks like the follow-up of her, that
15 she wrote me after our conversation.

16 Q So if I -- let me give you a moment for you to read that
17 E-mail through in its entirety, and then let me know when
18 you're done.

19 A Okay. I'm going to have to minimize my gallery view here.
20 Okay.

21 Q First, let me ask if you could please tell me what
22 suggestions after, or as a result of talking to Jane Doe's
23 mother, what suggestions did you make that she's referring to
24 here in the first sentence of that E-mail?

25 A So the suggestions were, since she brought me the complaint,

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1 I needed some more substantive, something substantive to go
2 off of. I can't just -- you know, I wanted her to provide me
3 with some substantive elements to this complaint before I
4 would further that, and consider it, because she told me a
5 lot in that conversation. And so I said, well, you know,
6 whatever you have to provide me to substantiate what you told
7 me, that would be helpful in considering what I ought to do
8 with it. And so that was one of the suggestions.

9 Another suggestion was, because of the safety concerns
10 and the angst that she had about the situation, that she -- I
11 said, you know, you always have, since you're already
12 involved with Wayne State Police, you have the option for a
13 PPO; you could follow up on that, depending on where you're
14 at with this. So those were the two suggestions that I
15 remember.

16 Q Okay. When you made those suggestions to what you described
17 as a clearly distraught mother, what authority were you
18 relying on to be able to provide that advice?

19 A Well, my own authority in terms of it was just common sense
20 to say, I'm not going to act on something without having some
21 substantive, something to look, you know, to substantiate her
22 complaint. So that was just my own authority, as an
23 institutional official, that I was doing due diligence. And
24 then, obviously, with Wayne State Police already being in the
25 picture, I made that suggestion about, you could initiate a

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1 PPO if that's where you feel like you need to go with this.

2 Q And at the time that you made the recommendation for a PPO
3 which, am I correct, it's my understanding that you're
4 referring to a Personal Protective Order?

5 A Well, I want to say I didn't make the recommendation; I said
6 it was an option, since she had already been in contact with
7 police. So it was not my personal recommendation, it was
8 just an option that she had, that I pointed out to her.

9 Q I just want to make sure, you've referred to it as a PPO
10 several times. We're talking about a Personal --

11 A Yes, a Personal Protection Order.

12 Q At the time that you spoke with her earlier that day, do you
13 know whether anyone had actually made a complaint to the
14 Wayne State Police Department?

15 A No, I was not aware of that.

16 Q And do you know what other police departments cover Wayne
17 State?

18 A Well, Detroit Police Department, I think, works in tandem
19 with Wayne State Police, but typically, Wayne State, it
20 covers our square mile, if you will, of our campus, like
21 pretty much, they are the go-to for anything that happens on
22 the campus.

23 Q But you were not told by Mrs. Burton that Anthony had been
24 arrested, or that any other legal action had been taken at
25 that time against my client?

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1 A No, she told me that this Police Report was in progress.

2 Q And you thought -- is it fair to say that you thought it was
3 appropriate, given the circumstances, to discuss a student at
4 the Medical School with a third party, even though you didn't
5 really know who you were talking about, you just knew how she
6 was representing herself?

7 A No, that's not fair to say, because I did not discuss him, I
8 was taking in her complaint, because there was no reason for
9 me to discuss him. I was simply the receptor receiving her
10 complaint, and basically that was the point of the
11 conversation. It came out of the blue on that afternoon, as
12 you know.

13 Q At any time in that conversation did you have any concerns
14 that you might be violating FERPA, known by the Family
15 Education Records Protection Act?

16 MR. PORTER: Objection, foundation.

17 Q (BY MR. FLORES) Are you familiar with the privacy rights of
18 students, Dr. Chadwell?

19 A Of course.

20 Q Are you familiar with what I'm referring to as FERPA?

21 A Yes.

22 Q And were you -- did you have any concern whatsoever as to
23 whether or not there might be a violation of FERPA in even
24 having this telephone call with someone who you did not know,
25 but was representing themselves as a victim?

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1 A There were no educational records shared, nothing that was
2 specific to Mr. Eid. It was simply an intake, and that's why
3 I asked her, for her to -- the burden was on her to provide
4 me with additional substantive reports, which she did in this
5 E-mail, to even see if this was valid, and something that
6 would need to be advanced.

7 Q And just to be clear, did you raise the issue of the PPO, or
8 did she?

9 A She -- it was in the course of the conversation, and her
10 telling me about the Police Report, and just wanting, her
11 daughter wanting to just be left alone, and so it was in that
12 context. And so, again, it was more a discussion of options,
13 you know, while you're talking with the police, you could
14 explore that, but it was not a recommendation; it was simply
15 that's something that you would talk to, you could talk to
16 the police about.

17 Q You simply raised it, you did not recommend it?

18 A Right. No, there was -- right, it was just based on that
19 initial conversation. I had no reason to recommend that.

20 Q I'd like to direct your attention to the bottom, the last
21 couple sentences of the E-mail. Do you still have it visible
22 to yourself?

23 A I do. Yep, I do.

24 Q Is it fair to say that the parent did not, was very
25 uncomfortable with the notion that Mr. Eid would become a

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1 doctor, and have the responsibility to care for patients?

2 A Well, it's just what she said here. She was very -- I am
3 very concerned about someone with this character becoming a
4 doctor. That's her words.

5 Q And did you share that concern?

6 A Share that concern, with --

7 Q Based on what the parent had just told you.

8 MR. PORTER: I'm sorry, Bob.

9 THE WITNESS: Share it with --

10 MR. PORTER: I didn't catch the first part of that.

11 Q (BY MR. FLORES) Based on the E-mail and the earlier
12 conversation with Pam Burton, did you share her concern about
13 Mr. Eid becoming a doctor?

14 A Well, it wasn't specific. I mean, this just -- she -- this
15 happened with Mr. Eid, and what she was telling me, but
16 anyone who would do, you know, what she claimed, would
17 warrant some, you know, would be a concern in terms of
18 honesty and, yes, would be concerning as far as our
19 professional, if I hold it up to our professional Code of
20 Conduct for our physicians in training.

21 It could be any student. If there was no name attached
22 to this, and this was just sent to me just at random, then,
23 yes, it's concerning at face value.

24 Q And while you were talking with Pam Burton earlier in the
25 day, did you take any notes while you were having that

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1 conversation?

2 A Not that I remember. I mean, again, I put the onus -- it was
3 kind of at the end of, I think the end of the afternoon; I
4 was getting ready to wrap things up, and this phone call came
5 in. And so that's why I said, you know, send me what you
6 would like to substantiate, or like to, you know,
7 substantiate this conversation as much as you want. And so
8 the onus was really on her, but I don't remember taking any
9 notes or -- all I had was, I think, the little piece of paper
10 with her name and the phone number from the receptionist,
11 that's about it.

12 Q Did you do anything related to this complaint after having
13 that conversation with Pamela Burton?

14 A Yeah, so -- so, obviously, this has now reached me, elevated,
15 or encouraged by a highly regarded and knowledgeable faculty
16 member that this Pamela Burton worked with, namely, Dr.
17 Friday. And now she sent me all this supplemental
18 information, you know, materials in support of what she told
19 me during the conversation.

20 So as an -- now it's institutional knowledge, because
21 I'm the institutional person responsible for our student body
22 at the Medical School. So, yes, so I definitely had to think
23 through, what do I do with this information. And so two
24 things, one is anything of this level of concern is not
25 something I would look at on my own, and make a

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1 determination. It's something I would always share with my
2 boss, the Vice Dean of Medical Education, to make him aware,
3 and so that's what I did. I did share this with my boss, and
4 we talk about all of these sorts of issues, student issues on
5 a weekly basis.

6 And the second thing that came out of it is, basically,
7 that, you know, whether or not it's true, I didn't know. I
8 mean, I don't know how much credibility there is, where this
9 was all going, but I had to share that with, also, Dr.
10 Jackson, who was the Chair of the Professionalism Committee,
11 to look into it, because that was not my job to verify this,
12 to look into it.

13 But the complaints were definitely serious enough in
14 terms of our professional expectations of our own students,
15 that it needed to be at least funneled to the person who
16 could do a deeper look at this, and determine if this is
17 something that would rise to a professionalism, you know,
18 hearing or charge, if you will. And so that's why I sent
19 that to Dr. Jackson.

20 And one other person that would need to know this, that
21 I shared it with, is the counselor for Mr. Eid, and that's
22 Mrs. Robichaud, just as an awareness.

23 Q On that -- after you received the call from Pam Burton, did
24 you reach out to Dr. Friday to confirm that the
25 representation that was being made by Ms. Burton, was

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1 actually true?

2 A I don't think I -- I don't recall, like, reaching out to
3 her. I may have seen her in the hallway, but I mean, it's --
4 I didn't -- I didn't think that was -- that was not, like, a
5 priority in terms of, because I had so much that was sent to
6 me and relayed to me here in terms of material from Ms.
7 Burton, to substantiate what her initial complaint was, or to
8 round out her complaint.

9 So I think I, you know, I would frequently see, you
10 know, occasionally, I would say, see Dr. Friday coming
11 through our office suite, and I may have, you know, said
12 something to her about it then, but really, that wasn't
13 something that I felt needed to be tracked down.

14 Q Okay. So prior to distributing this information that you
15 received from an individual identifying herself as Pam
16 Burton, and working at Children's with Dr. Friday, before
17 you -- you went ahead and circulated this information before
18 confirming any of the information that Ms. Burton provided
19 you with Dr. Friday, is that correct?

20 A Well, circulating is not the right word. There's no
21 circulation; these are very sensitive things that come to me,
22 and like I said, they were pinpoint directed at three
23 particular individuals who I felt needed to know. And so,
24 again, that was Dr. Baker, my Vice Dean of Medical Education;
25 Dr. Jackson, the Chair of the Professionalism Committee, and

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1 the class counselor, as just an awareness, FYI.

2 So the onus wasn't on me at all to, in my capacity to,
3 you know, verify the information before I sent it, or I
4 shared that with what was in my context of my
5 responsibility. So, no, I didn't go back and start the
6 fact-finding and verifying and all that; it was simply for
7 consultation, where do we go from here, and the individuals
8 who could actually do that.

9 Q Again, I just want to confirm, you viewed your responsibility
10 as needing to provide this information that you received to
11 Dr. Jackson, to Dr. Baker, and to Mrs. Robichaud, is that
12 correct?

13 A What was your question, if it was my responsibility?

14 Q If it was your responsibility, after receiving the complaint,
15 to send this information to Dr. Jackson, to Dr. Baker, and to
16 provide it to Mrs. Robichaud?

17 A I felt that that was my responsibility, to those select
18 individuals, for very specific reasons.

19 Q So, and this was done -- I'll withdraw it.

20 Okay. So at the time that you sent this, or received
21 this E-mail, you had had three or four hours to kind of think
22 about the complaint. Were you concerned; were you anxious
23 about this, were you -- did you think this was a real
24 emergency? What was your thinking about this complaint at
25 that time, at the very beginning?

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1 A It definitely gave me some pause for, cause for pause, in
2 terms of really having to think through it, and it was
3 troublesome, very troublesome to hear this. And it was very
4 much a, if true, very much a significant issue that I knew
5 was going to have to be addressed in the right, with the
6 right individuals that I just mentioned, and in the process
7 of the medical school to be looked into. I mean, I knew at
8 least that, that this has to be looked into, because it
9 really was a professionalism, and it looked like an honesty
10 issue that she was recounting to me, an interpersonal
11 relationship issues. Those are specific things within our
12 Code of Professionalism for our physicians in training that
13 really seemed out of kilter.

14 So it just seemed like a very bizarre, almost, story
15 that, but she had this, you know, these attachments that were
16 supporting her, her complaint to me. And they, for sure,
17 needed to be looked into within the right process and that's
18 -- yeah, so during those hours I definitely felt the, you
19 know, I thought, well, this is very serious sounding, and I
20 was awaiting her substantiation before I did anything with
21 it.

22 Q And you had been in your current position for about a year, a
23 year and a half at the time that this complaint came to your
24 attention, is that correct?

25 A Correct.

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1 Q Had you dealt with anything like this in that, you know,
2 during those previous months?

3 A Yes, I have -- I have dealt with many professionalism issues,
4 severe, significant, some not so -- the whole spectrum, and
5 also had served previously on the Professionalism Committee
6 for many years as a faculty member, was invited to serve on
7 that Professionalism Committee. And so I had seen quite a
8 few, I would say the most egregious issues that bubble up in
9 a medical school setting. And so I felt like a gauge, had a
10 pretty good gauge about how serious this was, or could be.

11 MR. FLORES: If we would -- if you would go ahead
12 and -- let me just make sure it's the right document. Could
13 you please publish Exhibit E.

14 EXHIBIT TECH: One moment.

15 MR. FLORES: And go down to the second page where
16 the E-mail starts. Okay. Go down further to the bottom half
17 of the page; one more. Is that the end of the document right
18 there?

19 EXHIBIT TECH: Yeah. Yeah, that's just --

20 Q (BY MR. FLORES) Okay. So this -- do you recognize this, Dr.
21 Chadwell?

22 A Sure, uh-huh.

23 Q And can you read the date on what's been marked as Exhibit
24 E.

25 A An E-mail from December 5, 2018.

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1 Q And can you tell me what time?

2 A 8:22 a.m.

3 Q So on December 5th, early in the morning, you sent a copy of
4 the -- do you remember what you sent to Dr. Baker, as
5 attached to this E-mail?

6 A It was Nikolina Camaj's report regarding her, yeah, her
7 report of Anthony Eid.

8 Q Give me just a moment. Okay. And do you remember sending
9 the report, also, to Dr. Jackson?

10 A I don't know if he received it separately, or if I sent it.

11 Q All right.

12 MR. FLORES: Could you please publish **Exhibit D**.

13 EXHIBIT TECH: Was that B; B as in boy?

14 MR. FLORES: David.

15 EXHIBIT TECH: D, as in David.

16 MR. FLORES: And go down to the second page.

17 Q (BY MR. FLORES) Take a look at that E-mail, and see if that
18 refreshes your recollection as to what, or whether you sent
19 the report to Dr. Jackson?

20 A Okay. Yeah, it looks like the same thing. He may have
21 received it separately, I don't know, but I -- yeah,
22 because -- yeah, I felt like he should have it.

23 MR. FLORES: Okay. You can take that off the
24 screen.

25 Q (BY MR. FLORES) Now, are you familiar with something called

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1 the Behavioral Intervention Team?

2 A Yes.

3 Q Can you tell me what that is?

4 A So it's a Main Campus Team Meeting Committee, if you will,
5 made up of various components of the University,
6 representatives of the University, including police, Title 9,
7 Code of Conduct Officer, legal counsel, and they'd look at
8 and review student issues, complaints.

9 Q And is this something that -- is it also referred to as BIT?

10 A I think so, yeah. BIT, B-I-T, uh-huh.

11 Q And does this committee meet on a regular basis, or on an ad
12 hoc, as necessary basis?

13 A I don't know for sure.

14 Q Do you remember attending a meeting of the Behavioral
15 Intervention Team shortly after getting the complaint from
16 Pamela Burton?

17 A Yes, I did meet with them. Uh-huh.

18 Q Okay. And at that meeting, did you discuss the complaint?

19 A Actually, the complaint --

20 MR. PORTER: Well, I would object and instruct the
21 witness not to answer if it requires you to disclose
22 privileged confidential communications between counsel and
23 those around the BIT meeting. But if you do not need to
24 disclose privileged information or communications to answer
25 his question of whether it was discussed, yes or no, then you

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1 can answer.

2 THE WITNESS: Okay. Yeah, I was simply going to
3 say, it was their meeting, it was on their agenda. That's
4 about it, yeah.

5 Q (BY MR. FLORES) Do you know who placed it on the agenda?

6 A I have no idea.

7 Q And does that Behavioral Intervention Team deal with minor
8 cases, or cases of some seriousness?

9 MR. PORTER: Objection, form and foundation.

10 Q (BY MR. FLORES) What kinds of cases came before the
11 Behavioral Intervention Team while you were participating?

12 MR. PORTER: Objection, foundation.

13 Q (BY MR. FLORES) You can go ahead and answer.

14 A Are you referring to that particular meeting, or in general?

15 Q At the time that you were Associate Dean, up until today,
16 have you participated in Behavioral Intervention Team
17 meetings?

18 A No.

19 Q So the only Behavioral Intervention Team meeting that you
20 ever attended was the one involving a discussion of Mr. Eid?

21 A On request, yes.

22 Q Does anyone from your office typically attend those meetings
23 when they're held?

24 A No.

25 Q So this was a serious -- you perceived this -- is it fair to

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1 say that you perceived this to be a serious escalation in how
2 the school was dealing with this complaint?

3 MR. PORTER: Objection, form and foundation.
4 Anytime I object, unless I tell you not to answer, you can
5 just go ahead and proceed to answer; I'm just putting an
6 objection on the record, that's all.

7 THE WITNESS: Okay. So it wasn't an elevation, I
8 would say, from the School of Medicine. Dean Strauss had
9 already been involved, so I would say, I mean, I don't know
10 what his process is for BIT; as I said, that was the only
11 time I was requested to join them. So it seemed to be an
12 escalation, or a seriousness placed on that from the
13 University's standpoint, as well as ours, because we had
14 discussed that, you know, Dean Strauss and I often talk about
15 difficult cases that kind of cross over into our various
16 realms. And so, yeah, it was, it was a serious issue,
17 obviously, for both, both the University at large and the
18 School of Medicine.

19 Q (BY MR. FLORES) At that meeting, was Dr. Strauss in
20 attendance?

21 A He was.

22 Q Prior to that meeting, did you have an opportunity to discuss
23 that matter with Dr. Strauss?

24 A We had a brief discussion, yes.

25 Q Where did that take place?

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1 A It was phone. It was, yeah, I think it was right after the
2 phone call from, shortly after the phone call from Pamela
3 Burton, because she had -- they had already been -- Dean
4 Strauss already knew about it because of Wayne State Police.

5 Q How did you find out that Dean Strauss already knew about the
6 case?

7 A He, I think, was copied on a, I'm trying to remember, on some
8 of the communication that I saw from her, and so I reached
9 out to him, and we briefly discussed it.

10 Q When you say copied by her, who are you referring to?

11 A He was on some kind of, on some of the communications that
12 she had sent, I believe he was already, what I recall, he was
13 already on some of, cc'd on something, whether -- I don't
14 know if it was directly from her, but it was on one of the
15 reports. I think he gets copied on whatever, the University
16 procedures on the reports.

17 Q I'm just trying to get the name of the person -- you used a
18 pronoun, she, that Dr. Jackson was copied by her, or is that,
19 is that Pamela Burton?

20 A I was talking about Dean Strauss.

21 Q My apologies. I'm trying to figure out who you're referring
22 to copied Dr. Strauss?

23 A Okay. So when Pamela Burton supplied me with that E-mail on
24 October 31st that evening, with her materials attached, I
25 believe he was -- what I recall, is that he was on -- I'd

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1 have to go back and look at this, but I saw that he had
2 already been copied on some of that. And I don't remember
3 which exact piece was an attachment, but that told me that he
4 already was somewhat aware of what was going on.

5 And so whenever, you know, there's crossover, like I
6 said, of issues of an undergraduate student and the Medical
7 School, you know, we often connect with each other, and just
8 make sure that we're, we're understanding, and we're in
9 collaboration and coordination, that we know what needs to be
10 done.

11 MR. FLORES: Okay. If you would publish Exhibit B,
12 please.

13 EXHIBIT TECH: One moment.

14 MR. FLORES: And if you would go down to page two.

15 Q (BY MR. FLORES) Dr. Chadwell, if you would read this E-mail,
16 and then the one below it, and let me know when you're done.
17 And you can just ask the technician to scroll when you're
18 ready.

19 A Okay. You can scroll. Okay.

20 Q So if you go to the top E-mail first. So this E-mail, is it
21 fair to say, is a response by you to Loretta Robichaud on
22 November 5th, and that this E-mail also refers to the meeting
23 with the Behavioral Intervention Team, is that correct?

24 A Well, yeah, it is referencing that BIT meeting, and it is an
25 acknowledgment; it says, Thank you, Loretta, of her E-mail.

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1 Q So the meeting that's referenced in that first sentence is a
2 meeting with the Behavioral Intervention Team, is that
3 correct?

4 A I think that was the date, yes.

5 Q And you -- had you already sent Dr. Baker an E-mail prior to
6 his return that's reflected in sentence number one?

7 A I had, as I said before, alerted him to, yeah, shared the
8 information with him.

9 Q And you were letting Ms. Robichaud know that you would be
10 discussing it further with Dr. Baker when he returned?

11 A That's what I said there, yep.

12 MR. FLORES: Can we go down to the second E-mail.

13 Q (BY MR. FLORES) Now, are you familiar with the post that
14 Loretta Robichaud holds at Wayne State?

15 A Yes.

16 Q What is that?

17 A She is a counselor, a long-standing counselor at the School
18 of Medicine, in the Office of Student Affairs.

19 Q And what -- do you know what the job of the counselor is?

20 A Yes. Did I miss something?

21 Q Could you please tell me what the job of counselor entails?

22 A Sure. So each class of 300 in the School of Medicine has a
23 dedicated, designated class counselor, and their role is to
24 provide personal support. It's not therapeutic counseling in
25 that sense, but it's personal support for any kind of

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1 challenges that that student, their class, individual
2 students may encounter from the time they matriculate all the
3 way through to graduation.

4 So, and they also are responsible for, you know,
5 providing resources external to the School of Medicine, and
6 that could be, you know, really any kind of resources that
7 the student might need for support, academic; it could be
8 personal, it could be mental health resources.

9 So that's, essentially, what counselors do, is they
10 provide that personal one-on-one support, and also for the
11 class at large, that they're responsible for.

12 Q And to your knowledge, was Ms. Robichaud assigned to my
13 client's class?

14 A Yes.

15 Q Now, is it fair to say that Ms. Robichaud, at the time that
16 she wrote this E-mail, was extremely upset?

17 MR. PORTER: Objection, foundation.

18 THE WITNESS: I have no idea if she was upset or
19 not when she was writing this.

20 Q (BY MR. FLORES) Have you had a chance to reread that E-mail?

21 A Yeah, I mean she's obviously concerned and unnerved by it,
22 but she -- I don't know what her, like, emotional state was
23 when she was writing it, if that was the question.

24 Q But it's fair to say she was upset when she wrote this
25 E-mail?

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1 MR. PORTER: Objection, foundation.

2 THE WITNESS: Well, she, again, she's expressing
3 extreme concern, but that's obvious.

4 Q (BY MR. FLORES) Did she express a concern that, as a result
5 of the University's knowledge of this complaint, that the
6 University could be liable?

7 A Well, she's referencing MSU. I know from Mrs. Robichaud that
8 she is extremely student, you know, protective, and advocates
9 for her students more than most anybody would. And so, yeah,
10 I think she was concerned about, you know, if this is, you
11 know, if this bears out in the meeting that was referenced
12 then or, you know, if it was, whatever steps were going
13 forward, that that could be problematic, you know, for the
14 University.

15 Q Did she include in this E-mail any caution to you that it's
16 too early to decide whether or not Anthony represents a risk
17 to the school or to himself, because nothing has been proven,
18 and there's no, no investigation has taken place; is there
19 any caution on her part reflected in this E-mail?

20 MR. PORTER: Objection, form and foundation.

21 THE WITNESS: Well, she says, I was thinking about
22 the meeting coming up, so she was processing it, it looks
23 like, you know, in her own, from what she knew about it at
24 that point. And I'm sure she was putting it in the context
25 of the entire medical school, her class, all the students

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1 and, you know, so as far as -- I think she was trying to err
2 on the side of, you know, caution. What was our
3 responsibility in terms of making sure that there was no risk
4 to, you know, as an institutional office that's responsible
5 for students.

6 Q (BY MR. FLORES) Is it fair to say that this E-mail reflects
7 her concern for the University as a whole, rather than for my
8 client?

9 MR. PORTER: Objection, form.

10 THE WITNESS: She -- I can tell you, having gone
11 through the entire process with Mr. Eid, that he couldn't
12 have had a more, a stronger advocate, if you will,
13 throughout. And that is one of the fillers, I would say, of
14 what we do in Student Affairs, is that regardless of, you
15 know, what the situation is, our primary purpose is to really
16 provide as much advocacy as we can.

17 Obviously, sometimes things, you know, become really
18 difficult in terms of, like, this complaint that came to us
19 to, you know, provide that support and be that advocate,
20 while also looking into real concerns, real professional
21 concerns. So that's what I see here.

22 Q (BY MR. FLORES) But she didn't provide any of that
23 information about concern for Anthony in this E-mail, did
24 she?

25 A Well, she -- again, it looks like she was processing her own

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1 thoughts about it, and about the meeting that was coming up.
2 And I think her support of Anthony was continuous all the way
3 until the very, until the very end and, you know, but that
4 doesn't discount, you know, the fact that she has had
5 personal reflection on the complaint, and on the concerns
6 that were being moved forward.

7 Q Dr. Chadwell, this is a fairly simple question. Does this
8 E-mail, to you, focus on the concerns that she had for the
9 school, or the concerns she had for Anthony, just this
10 E-mail?

11 A Okay. Well --

12 MR. PORTER: Objection to form, and it calls for
13 speculation.

14 THE WITNESS: I would --

15 MR. FLORES: She can tell me what her impression
16 is.

17 THE WITNESS: Yeah, my impression is completely her
18 concern was for students at Wayne State University as a
19 whole, and that includes Anthony Eid in that, too. So the
20 concern is 360, so it's all students that, you know, could be
21 at risk if this were the case, and it's students, in general,
22 I think is the concern.

23 Q (BY MR. FLORES) The second sentence in this E-mail says,
24 Let's not let this happen on our campus as it did at MSU.

25 Do you understand what she was referring to?

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1 A I don't remember what the exact reference is to. I think
2 there was something going on at Michigan State at the time in
3 terms of -- but honestly, I don't remember what she was
4 referencing, like the exact case.

5 Q Are you familiar with the name, Larry Nassar?

6 A Of course.

7 Q Do you remember what school he worked at?

8 A I believe it was MSU.

9 Q Do those two pieces of information -- if you will reread that
10 second sentence, can you tell me what she was referring to?

11 MR. PORTER: Objection, asked and answered.

12 Q (BY MR. FLORES) If you could reread it, and just tell me how
13 you can answer the question. Do you know what she was
14 referring to when she wrote that second sentence?

15 MR. PORTER: Objection, asked and answered.

16 MR. FLORES: You need to answer the question.

17 THE WITNESS: I should answer?

18 MR. PORTER: Yes, every time unless I tell you not
19 to.

20 THE WITNESS: Okay. I just hadn't heard you say
21 that phrase, asked and answered. Okay. So I should go ahead
22 and answer? Okay.

23 So, yeah, I mean, thinking back, that was probably when
24 that was going on, but I think it wasn't an inference to
25 Nassar, in particular. I mean, I think it was, again, more

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1 the, you know, a university at large incurring a risk because
2 of an individual. That's the way I -- that's the way I
3 remember thinking about it. I mean, that's the way it still
4 strikes me right now when I'm reading it.

5 MR. FLORES: Okay. It is 11:30 and, again, I'm
6 sorry, I should have taken a break a little while ago, but
7 why don't we take a 10-minute break, and be back at 11:40.
8 Does that work for you, David?

9 MR. PORTER: Yep, that sounds good. Thank you.

10 (Whereupon, a short break was taken.)

11 Q (BY MR. FLORES) Okay. I'd like to go back to the BIT
12 meeting that you attended. So we just discussed the E-mail
13 from Loretta Robichaud to you, in which she expressed
14 concerns. And is it fair to say your conclusion was that she
15 was concerned for everybody, all students --

16 A Yeah.

17 Q -- not just --

18 A I think, based on what she wrote, Wayne State University was
19 clearly in there, yep.

20 Q And it's also -- is it fair to say that she was alarmed by
21 the allegations?

22 MR. PORTER: Objection, it calls for speculation.

23 THE WITNESS: She was expressing her, I think,
24 yeah, her concern, really, you know, in what she learned
25 about her student, just in the initial complaint.

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1 Q (BY MR. FLORES) And you responded to her on November 5th,
2 letting her know that you had gotten the E-mail from her, and
3 informing her that you would be talking with Dr. Baker, and
4 also attending the BIT meeting on Monday?

5 A I didn't say BIT meeting, but yeah, that was what I think I
6 was referring to, yep.

7 Q So did there come a time that -- or rather, what time did
8 that meeting take place, if you remember, on Monday, November
9 5th?

10 A I think it was an afternoon, an afternoon meeting, I want to
11 say, but I'm not -- I can't remember for sure.

12 Q And do you remember who was present?

13 A It was -- I don't know all the members of that group, but I
14 think it's their standing members, of which I only knew
15 several. Like I said, Dean Strauss was there, legal counsel
16 was there, the Code of Conduct Officer, the Title 9 Officer,
17 and a police representative. That's -- those are the people
18 that I recognized. And I think also the Director of the
19 CAPS, which is the psychological services on Main Campus.
20 Yeah, those are the ones I recognized.

21 Q Can you tell me what that acronym, CAPS, stands for?

22 A It's Counseling and Psychological Services.

23 Q Okay. Did someone lead the discussion when it turned to a
24 discussion of Mr. Eid?

25 A I think they have kind of -- I don't know. It was on the

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1 agenda. It seemed like I was called in just for that part.
2 And I want to say it was Dean Strauss who -- he's probably
3 the head of that. I don't even know if he's the head of that
4 committee or not, but that's what I remember, that he was
5 carrying the conversation on it.

6 Q Did you make any comments during the meeting?

7 MR. PORTER: Objection. I'll instruct the witness
8 not to answer if it requires you to divulge attorney/client
9 privileged communications.

10 THE WITNESS: Okay. Well, I was obviously invited
11 to participate, so I couldn't remain mute the whole time.
12 So, yes, I provided some, you know, answers to -- or just, it
13 was more of, like, a conversation, discussion.

14 Q (BY MR. FLORES) Did you have an opportunity to provide to
15 the members of the team the facts, as you understood them in
16 your telephone conversation with Pamela Burton?

17 MR. PORTER: I'm going to instruct the witness not
18 to answer if it requires to disclose attorney/client
19 privileged communications, which includes communications from
20 team members to legal counsel, and legal counsel to team
21 members as part of the discussion of this matter.

22 THE WITNESS: Okay. Then I'll refrain.

23 Q (BY MR. FLORES) What did you say to the team regarding
24 Anthony Eid?

25 MR. PORTER: Same objection, to the same question.

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1 MR. FLORES: I take exception. I don't believe the
2 privilege applies in this context, and it doesn't cover her
3 recitation of factual information.

4 Q (BY MR. FLORES) Did there come a time in the meeting that
5 the legal counsel gave you legal advice?

6 MR. PORTER: Objection.

7 THE WITNESS: Well, the legal counsel was sitting
8 there the entire time, and was part of the active discussion
9 they were having, so in the flow of that, it would be hard to
10 tease out, yeah.

11 MR. PORTER: I just caution you not to refer to or
12 describe the communications between counsel and the team.

13 MR. FLORES: And I'm taking exception to that,
14 David. We'll have to deal with that afterwards.

15 Q (BY MR. FLORES) Okay. So did you -- did you talk to anyone
16 after the BIT meeting about Mr. Eid?

17 A Oh, just what I said, that I would, you know, let Dr. Baker
18 know how it goes and what, you know, next steps are, as my
19 boss.

20 Q What did you tell Dr. Baker?

21 A That the meeting happened, who was present and that,
22 essentially, that Dean Strauss was taking the complaint that
23 came to him, as well through his own process, before it came
24 back to the Medical School.

25 Q And do you know if, as a result, or after the BIT meeting, an

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1 investigation was launched as to the complaint?

2 A My understanding is that Dean Strauss did initiate a process

3 of fact-finding, and a report that emanated from that.

4 Q And do you remember who was assigned to do the fact-finding?

5 A That was Nikolina Camaj.

6 Q And what position did she hold, to your knowledge?

7 A She is the Code of Conduct Officer.

8 Q And to your knowledge, did she conduct a fact-finding

9 investigation?

10 A Well, I received her report so, yes.

11 Q And do you remember when you would have received that report?

12 A I think it was that November, that E-mail when she sent it to

13 me, I think it was the 5th, maybe, of November. You had it

14 up earlier.

15 Q Okay. Hold on a second.

16 A Or maybe it was later than that. I don't remember the exact

17 date.

18 MR. FLORES: Please publish **Exhibit C**, please.

19 EXHIBIT TECH: One moment.

20 Q (BY MR. FLORES) Please take a look at that, Dr. Chadwell,

21 and tell me if that refreshes your recollection as to when

22 you received the Investigation Report from Nikolina Camaj?

23 A Sure. Yep, that looks correct.

24 Q The date?

25 A December 4, 2018.

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1 Q Now, between the time that you went to the Behavioral
2 Intervention Team meeting and receiving this report on
3 December 4th, did you have any other meetings or
4 conversations with any other Wayne State University officials
5 about my client, Anthony Eid?

6 A I think we were just -- I don't recall that. We were just in
7 a holding pattern on waiting on Dean Strauss to complete his
8 process, so there really wasn't anything more to do at that
9 point. So, yeah, I don't remember anything active happening
10 during that period.

11 Q And did you keep Mrs. Burton apprised of the status of the
12 University's progress?

13 A I didn't have, like, a check-in with her, if that's what you
14 mean, like a regular check-in with her to keep her informed,
15 no.

16 Q Did you ever call her back and let her know whether things
17 were moving, or if the University was moving on?

18 A No, it was really, like I said, I mean, I passed it to the
19 responsible parties in terms of, it was really out of my
20 purview to do that. It was Dr. Jackson who, you know, who
21 took it from, after I shared the materials with him, it was
22 really up to him.

23 Q So you had no further conversation after October 31st with
24 Pamela Burton, is that correct?

25 A That's correct.

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1 Q Now, let's just, for a moment, assume that the allegations
2 were true. If they were true, is it fair to say that you
3 knew that a possible outcome of any process could result in
4 Mr. Eid's expulsion from the Medical School?

5 MR. PORTER: Objection, form. What process are you
6 referring to?

7 MR. FLORES: Official process that the University
8 has, or the Medical School has.

9 THE WITNESS: So honestly, my mind didn't go that
10 far, to reach that conclusion. I really just wanted things
11 to take their course because, I mean, Anthony, he was the
12 Class President, and I, you know, I had an actual, like, a
13 good relationship with him, I would say.

14 I had invited him up to the stage with me when we
15 welcomed our new incoming class, and had him say words of
16 welcome at the orientation. So I, you know, I did not want
17 to believe that that was the case, that he would, that that's
18 where this would end. I just -- that's not ever what I want
19 to happen to my students, especially, you know, knowing the
20 investment in their education as upcoming physicians.

21 So, no, that's not where my mind immediately went. My
22 whole focus was on, you know, I felt like I did my diligence
23 for the University, because that's what I was -- that's my
24 responsibility to do in terms of funneling it into the right
25 processes, which was the professionalism process through the

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1 Chair of that committee, and to my immediate boss for
2 consultation and advice about anything else that may need to
3 be done.

4 Q (BY MR. FLORES) All right. Let's talk a little bit about
5 the Professionalism Committee and the process of, the
6 judicial process of the Medical School.

7 When a complaint is made against a medical student that
8 involves a possible violation of the professionalism rule,
9 how is that adjudicated; how is that dealt with?

10 A Okay. So typically, when a complaint surfaces we have a, you
11 know, designated Chair of the Professionalism Committee, who
12 then, the onus is on them to look into that and to, you know,
13 do some initial fact-finding, and to see if this warrants,
14 you know, further action in terms of, is there a charging
15 party that would elevate this to the level of a hearing to
16 the entire committee. Is this something remediable that
17 doesn't need that kind of action. You know, is this -- you
18 know, so it's really in their purview to look at this, and to
19 make a determination as to what's next. But to actually go
20 to the level of a professionalism hearing, you know, it
21 requires a charge, if you will, a charging party.

22 Q And were you the charging party in this case?

23 A No, I was not.

24 Q So when you got the report from Nikolina Camaj, what did you
25 do with it?

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1 A I simply forwarded it to round out the, to supplement the
2 materials I had already provided to Dr. Jackson as the Chair
3 of the Professionalism Committee, and to Dr. Baker so that it
4 could be part of the whole package of looking at the case.

5 Q Did you make any recommendations when you sent the package
6 along to Dr. Baker and Dr. Jackson?

7 A None. It was out of my purview at that point. It was just,
8 I was responsible for making sure that they had the
9 information.

10 Q So once you transmitted the package, your work was done on
11 this case?

12 A Right. Right.

13 Q After they received the report, did Dr. Baker or Dr. Jackson
14 talk with you about the report?

15 A I don't recall that, like, it was -- I mean, I had read the
16 report and it was -- yeah, I don't recall having a meeting or
17 conversation about what to do, nothing like that, just an
18 acknowledgment that, you know, that they got it, and it's now
19 part of the rest of the materials.

20 Q If the Professionalism Committee decides that the charges are
21 well taken, what does the Professionalism Committee do with
22 that decision?

23 A What do you mean by, the charges are well taken?

24 Q Suppose they have a hearing, and they find that the charges
25 are, according to the Professionalism Committee, demonstrated

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1 by a preponderance of the evidence, what do they do next?

2 A It can go various ways. I mean, the Professionalism
3 Committee can make various recommendations. So they can
4 either pump things to the Vice Dean for a decision, they can
5 pump things to, back to the University at large. They can
6 decide that there's a remediation plan that can be followed
7 that's sufficient with follow-up. I mean, there's just any
8 number of recommendations that they can come up with and
9 make, given the particular situation.

10 Q Is one of the recommendations they can make to the Promotions
11 Committee to dismiss the student?

12 A That's often the recommendation, yes. The recommendation, by
13 the way, is not to dismiss the student; the recommendation is
14 to the Promotions Committee for review. Yeah, they can't
15 make the recommendation to dismiss; they can only make the
16 recommendation to the Promotions Committee, who has the sole
17 power to dismiss.

18 Q Correct, but they can express a -- they can take a position
19 with the recommendation of dismissal, even though they can't
20 dismiss the student, themselves, is that correct?

21 A That's not -- they could, but typically they would only say
22 that they would make the recommendation just for Promotions
23 Committee review and hearing at that level, and then it's up
24 to the Promotions Committee to decide. So they typically
25 don't qualify that recommendation with a call for dismissal.

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1 Q So you would be surprised to know that in this case, the
2 Professionalism Committee recommended dismissal?

3 MR. PORTER: Objection, form and foundation.

4 THE WITNESS: Well, I've been in enough
5 Professionalism hearings to know that that's definitely a
6 possibility if it's egregious enough. For example, if
7 someone cheated, yes, something to the level of where the
8 Professionalism Committee was sufficiently concerned, and had
9 enough reason to elevate it to that level, for sure, they
10 can -- like I said, they can make any recommendation that
11 they want, so it's up to them to do that.

12 So, yeah, but I wasn't privy to the Professionalism
13 proceedings, so I don't know what the actual recommendation
14 was that came out of that, or the minutes or anything like
15 that.

16 Q (BY MR. FLORES) Thank you. Dr. Chadwell, I want to go
17 through a little bit of your personal background, and how you
18 became a doctor, why you became a doctor, and I understand
19 that it's quite a compelling personal story.

20 A I don't know if I can promise you that, but --

21 Q Well, it's not the average ordinary story. I understand that
22 you're an immigrant, is that correct?

23 A That's correct.

24 Q What country were you born in?

25 A Germany.

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1 Q And when you arrived in this country, how old were you?

2 A I turned 10 the summer we moved here.

3 Q Did you speak English at the time?

4 A No.

5 Q So you learned to speak English going to school, and facing
6 all the challenges that are involved in that; is that fair to
7 say?

8 A That's fair.

9 Q I think, as we mentioned earlier, culture has changed quite a
10 bit, and you would have been certainly unique, probably, in
11 your class, as someone who was from a different country, and
12 didn't speak English well. And I'm just curious, was that
13 something that the kids rewarded you with, or was it a
14 penalty?

15 A Well, actually, are you referring to Wayne State's School of
16 Medicine, or just school in general.

17 Q Back in elementary school, and then middle school and high
18 school?

19 A Well, I was -- you know, we had lots of immigrant kids:
20 Chaldeans, Germans, Italians in our neighborhood; there was
21 Iraqis. So it was very much an immigrant community, and
22 that's why we came to that community.

23 So, no, I didn't -- I didn't stick out like a sore
24 thumb, if you will. I mean, I was the German kid, or the
25 Swiss kid; actually, we had moved to Switzerland before we

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1 came so -- yeah, no, I -- I mean, I guess we had a little bit
2 of a celebrity status, but we quickly learned -- in fact, we
3 learned English so quickly that -- and I was used to Swiss
4 schools, which were very tough.

5 So within one year -- they put us in the kindergarten
6 reading, and within one year they had to get the books from
7 the 8th grade, from junior high, because we read -- we tested
8 out of everything. So we were very -- in math, everything
9 was pretty easy for us. So it was just once we learned the
10 language and got hold of that, yeah, the rest is history.

11 Q Did you encounter much in the way of either discrimination or
12 bias while you were growing up?

13 A Not really. I mean, I had a very happy childhood, a very
14 fascinating childhood; traveled to 20 different, almost 20
15 different countries before I was 18, went to college, so --
16 and I think that's why I'm still at Wayne State, and I love
17 the diversity and the -- I feel like I have a lot of
18 connection -- I understand I've been in the Middle East, I've
19 been in South America, and just all over Europe, so I think I
20 have a pretty -- and our parents lugged us around everywhere,
21 let's just say that. And so we had a pretty good
22 adaptability, you know.

23 I wasn't raised with the feeling like being
24 discriminated against; it was more, actually, embracing
25 cultures. We had missionaries all over the world who stayed

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1 with us very often, so --

2 Q And as you progressed in school, and you applied for medical
3 school, you got in, did you face any kind of discrimination,
4 or any kind of harassment as a result of being a woman in a
5 field that, even at that time, women were making great
6 strides, but not everyone was happy about having women
7 significantly increasing their presence in the profession?

8 MR. PORTER: Objection, foundation.

9 THE WITNESS: Again, I never really -- maybe I was
10 just an ignorant kid, a happy kid, but I never had that
11 sense. Wayne State was the only school I applied to, and my
12 dad said, hey, there's a great school down the street, you
13 can be a doctor just like everybody else.

14 So I applied to Wayne, and I'm still there, so I
15 definitely have a fit, but I never felt -- I always felt it
16 was welcoming, and I never had that sense of male/female or,
17 like, some kind of lightning rod because I was a female or --
18 I've been the only female in the board room many, many times
19 over the years but, yeah, no, I don't look at it like that at
20 all, or didn't feel that way.

21 Q (BY MR. FLORES) In your role as Associate Dean, though, have
22 you talked with students who have experienced discrimination,
23 or experienced harassment, and had to deal with the issue
24 from that perspective?

25 A For sure, for sure. And I totally understand how that can

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1 easily be something that many students and many cultures
2 face. I mean, my parents just happened to raise us with a
3 very positive outlook, but definitely, because I was exposed
4 to so much, and had traveled so much, I definitely saw all of
5 that, it's just I didn't have a personal, sort of, sort of
6 stumbling block with that but, yes, it's something I see
7 routinely.

8 MR. FLORES: It would help me, if we can go ahead
9 and take down the exhibit, just so I can see everyone's
10 features a little larger.

11 Q (BY MR. FLORES) So I want to just ask, as a woman in a high
12 level, and very visible role at Wayne State, do you feel any
13 obligation, or do you take it upon yourself to work, to make
14 sure that women are being advanced in the Medical School at
15 Wayne State?

16 A There are -- there are committees to that, which I have not
17 been a part of. I know there are, you know, definitely ways
18 to get involved with that particular objective, but I have
19 not been involved with that because, yeah, my focus is on the
20 students, and all students. And about half of our students,
21 actually, now we tipped over to more than half are women and
22 so, yeah, it's changed a lot. The culture has changed a lot
23 in the last, like you said, you know, years that I've been a
24 student.

25 And so, yeah, I don't have a particular agenda, if you

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1 will, for advancing, but I'm very open door towards women,
2 obviously, and all students, but I know that everybody has
3 their own issues, you know. Women medical students having
4 children during medical school, I mean, those are things they
5 can definitely come and talk to me about, but there's no
6 particular initiative or agenda I would have to advance the
7 women students over anyone else.

8 Q I just want to go back and revisit the report that you
9 received from Ms. Camaj. When you reviewed it, did you do
10 the review before you sent it along to Dr. Jackson and Dr.
11 Baker, or did you send it first, and then when you had time
12 later on, review the documents?

13 A I usually don't forward things that I don't at least read, so
14 I probably skimmed through it. I'm sure I skimmed through
15 it. I think it was pretty early in the morning when I sent
16 it, if I remember the time stamp. Yeah, so I'm sure I just,
17 I read it, and then forwarded it, because Dr. Baker would
18 have expected that.

19 Q And did you have any responsibility to make sure that Ms.
20 Camaj had done a full investigation before accepting it, and
21 then turning around and sending it to Dr. Baker and Dr.
22 Jackson?

23 MR. PORTER: Object to form.

24 THE WITNESS: I have no control over that process,
25 or authority over Nikolina, whatsoever. So it came to me, I

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1 read it, I passed it on. That's basically it.

2 MR. FLORES: Okay. Give me a second. I think I
3 can jump over quite a bit, so if you'd just bear with me for
4 a moment.

5 THE WITNESS: Sure.

6 Q (BY MR. FLORES) Okay. During the time that you have been in
7 your position, your current position, has the Medical School
8 come under investigation by the Office for Civil Rights as
9 part of --

10 A During -- there has been -- I know of a complaint, yes.

11 Q Okay. And did that involve a medical student by the name of
12 Ms. Rubenstein?

13 A That's correct.

14 Q And do you know what the ultimate finding of the Office for
15 Civil Rights was after they concluded their investigation?

16 A I don't know.

17 Q Would it be a surprise to you to find out that the Office for
18 Civil Rights found that Wayne State had retaliated against
19 her by expelling her?

20 MR. PORTER: Objection, form.

21 THE WITNESS: Yeah, I don't -- I never got a report
22 about that.

23 Q (BY MR. FLORES) Did you -- were you aware that the
24 University agreed, had an agreement with the Office for Civil
25 Rights at the conclusion of their investigation?

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1 A Was I -- can you repeat that.

2 Q Are you aware that the Medical School signed an agreement
3 with the Office for Civil Rights at the conclusion of the
4 Civil Rights investigation?

5 A No, I'm not aware of that.

6 Q And within the last year, or rather, I guess, within the last
7 12 months, have you received any training, vis-a-vis,
8 retaliation and the Title 9 provided either by the General
9 Counsel's office, or by another provider?

10 MR. PORTER: Objection, asked and answered.

11 THE WITNESS: I have not received anything in terms
12 of training for retaliation, and I already referenced the
13 Title 9 update presentation that was provided internally last
14 summer sometime.

15 Q (BY MR. FLORES) Thank you. You testified just a few moments
16 ago that you had no control over Nikolina Camaj, is that
17 correct?

18 A Correct.

19 Q Do you know what Dean, or what University official she
20 answers to?

21 A I believe it's Dean Strauss.

22 MR. FLORES: Okay. Could you publish Exhibit G for
23 me.

24 EXHIBIT TECH: One moment.

25 MR. FLORES: David, I don't have a lot of

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1 additional questions, so I think I can probably get through
2 in about the next 20 to 30 minutes, so rather than taking a
3 break for lunch, I'd like to do that, if that's okay with
4 you.

5 MR. PORTER: Yeah, that works for us. Thank you.

6 MR. FLORES: All right. Can you go down to the
7 bottom of that document, please. Okay. Stop right there.
8 Go up a little more. Okay.

9 Q (BY MR. FLORES) Dr. Chadwell, will you do me a favor, and
10 just read that to yourself, and let me know when you're
11 done.

12 A Okay. Okay.

13 Q Can you tell me what that E-mail refers to?

14 A Dr. Jackson's E-mail here? It looks like he's trying to
15 coordinate an actual hearing for the Professionalism
16 Committee.

17 Q Do you know to whom that E-mail is addressed?

18 A Well, it looks like to Ms. Burton, and referencing charging,
19 being the charging party.

20 Q So approximately -- well, let me ask you this question.

21 From that E-mail, can you determine the name of the
22 person who will be the charging party at that hearing?

23 A Well, it looks like an inquiry from Dr. Jackson, because he
24 was ready to move it forward, and the E-mail obviously went
25 to Ms. Burton, but I don't know if she ultimately, I mean, it

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1 doesn't say that definitively she was going to have that
2 role.

3 Q So if she -- if the original complainant did not serve as the
4 charging party at a Professionalism Hearing, who could
5 substitute, if you know, for that party?

6 A It could be various individuals, but in this case, it was
7 most appropriate for Ms. Burton to serve in that role.

8 Q But that's also a role that Dean Jackson could play if she
9 was unavailable?

10 A No, typically, as the Chair, he would not be the charging
11 party.

12 Q So your testimony is, based on this, it was only Ms. Burton,
13 Amanda Burton?

14 MR. PORTER: Objection, misstates her prior
15 testimony.

16 THE WITNESS: I'm not sure what you mean, it was
17 only Ms. Burton. This looks like this was an initial inquiry
18 to her, to see if this was something she could -- yeah, so
19 it's -- yeah, that's what it looks like to me. It was just
20 his initial inquiry of her, to serve in that role, which was
21 most appropriate.

22 MR. FLORES: If you would scroll to the top of the
23 page, what's been marked as page one in the other E-mail.

24 Q (BY MR. FLORES) Can you just read that to yourself, and let
25 me know when you're done.

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1 A All set.

2 Q And what does that E-mail refer to?

3 A That's the original E-mail, yeah, that you showed me in the
4 beginning, from Ms. Burton.

5 Q Well, this E-mail is from you to Dr. Jackson on December
6 10th, isn't that correct?

7 A Right.

8 Q And in that E-mail, isn't it correct that you're asking Dr.
9 Jackson to remove some information from the Professionalism
10 packet that will be distributed to the members of the
11 committee?

12 A I'm not asking him to do that; I said it would be a
13 preference, and that's because that initial E-mail, in that
14 initial E-mail she referenced a PPO. And when I spoke with
15 Dr. Jackson, sorry, Dean Strauss about this way back when he,
16 you know, he -- we were kind of going back and forth about
17 what should be done next. And so he had, you know, he said,
18 it may not be at that level or, you know, as far as a PPO, we
19 don't know yet, and that.

20 So my point in sending this to Dr. Jackson to not
21 include that was because I thought it could taint Anthony's
22 perception, I guess, the perception of him to the
23 Professional Committee, because there was no PPO, that I was
24 aware of at that moment; it was just that, like, that was
25 just an option that Ms. Burton had at her disposal.

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1 So that was my reason for asking, or expressing my
2 preference, that it not be included in the Professionalism
3 packet, so that out of the gate it wouldn't, like, taint
4 Anthony, and let the rest of the fact-finding speak for
5 itself.

6 Q You didn't include any of this explanation that you're
7 providing today in this very short E-mail?

8 A No.

9 Q Did you speak with my client after the Professionalism
10 Committee determined to recommend dismissal to the Promotions
11 Committee?

12 A We didn't have, like, one-on-one meetings. I would see him
13 come in to meet with Mrs. Robichaud as she was, like, you
14 know, serving the role of the counselor, you know, her
15 counseling role.

16 So, yeah, I would see him, like, sort of peripherally in
17 the hallways, but we didn't -- I mean, it may have been just
18 -- you know, I try to be as encouraging to students as I
19 can. So if I saw him -- I think I saw him in the hallway.
20 I'm trying to remember, in passing and, like, I knew he was
21 going through -- it was obviously challenging on his end, as
22 it was for us, and so just trying to get us to kind of stay
23 the course, and let everything proceed the way it needed to.

24 MR. FLORES: Okay. I don't have any further
25 questions for the witness, so let me release her.

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1 (Off the record discussion.)

2 MR. FLORES: Dr. Chadwell, thank you very much for
3 your time and your attention, and the information you were
4 able to provide today.

5 (Whereupon, Deposition concluded at 12:20 p.m.)
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1 STATE OF MICHIGAN)
)SS
2 COUNTY OF CLINTON)

3 **CERTIFICATE OF NOTARY PUBLIC**

4 I certify that this transcript is a complete, true
5 and correct record of the testimony of the witness held in
6 this case.

7 I also certify that prior to taking this
8 deposition, the witness was duly sworn or affirmed to tell
9 the truth.

10 I further certify that I am not a relative or an
11 employee of or an attorney for a party; and that I am not
12 financially interested, directly or indirectly, in the
13 matter.

14
15 *Heidi A. Cook*

16 Heidi A. Cook, RPR/CSR-4827
17 Certified Shorthand Reporter,
18 Registered Professional Reporter, and
 Notary Public, County of Clinton,
 State of Michigan.

19 My Commission Expires: 06-02-2026
20
21
22
23
24
25

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